

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TRACEY WHITE, et al.,)	
)	
Plaintiffs)	
)	
v.)	Cause No. 14-cv-01490 - HEA
)	
THOMAS JACKSON, et al.,)	
)	
Defendants.)	

**MOTION OF THE ST. LOUIS COUNTY DEFENDANTS TO EXCLUDE EXPERT
TESTIMONY PURSUANT TO DAUBERT**

COME NOW Defendants Jon Belmar, Sgt. David Ryan, Officer Terence McCoy, Officer Michael McCann, Det. Derik Jackson, Det. Joseph Patterson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, Officer Daniel Hill, Officer Antonio Valentine, and St. Louis County, Missouri, (“St. Louis County Defendants”) and for their Motion to Exclude Expert Testimony Pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993) state as follows:

1. Plaintiffs disclosed Mr. Robert Pusins as an expert witness in this case, and submitted a signed report, which Defendants attach as Exhibit A.
2. Defendants ask the Court to exclude expert from the trial of this case because his testimony does not meet the criteria for admissibility under Fed. R. Evid. 702, as interpreted by *Daubert*.
3. Defendants submit the Affidavit of Police Chief Jon Belmar, and Exhibits B and C in support of their Motion.
4. Defendants further submit a Memorandum of Law which they incorporate as bases and grounds for their Motion.

WHEREFORE, for all of the above stated reasons, the St. Louis County Defendants ask this Court to exclude the testimony and opinions offered by Robert Pusins.

PETER J. KRANE
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was sent by the Court's electronic filing system this on this 29th day of April, 2016 to all counsel of record.